



Industrial Pretreatment Newsletter

What is Pretreatment?

The term “pretreatment” means the treatment of wastewater by commercial and industrial facilities to remove harmful pollutants before discharge to a sewer system under the control of a publicly owned treatment works (POTW). The U.S. Environmental Protection Agency (EPA) developed the General Pretreatment Regulations under Title 40 Code of Federal Regulations (40 CFR) 403 to set responsibilities for federal, state, and local government, industry, and the public to achieve the National Pretreatment Program Objectives.

Objectives of the Pretreatment Program:

- Prevent interference with the operation of the wastewater treatment plant
- Prevent the introduction of pollutants that could pass through the treatment plant untreated into the receiving stream
- Improve opportunities for reuse or recycling of wastewater and biosolids
- Prevent the introduction of pollutants that could cause health or safety problems to the public or the environment

About the Program...

The City of Raleigh Industrial Pretreatment Program consists of 15 Significant Industrial Users (SIU's) and 21 locally permitted Industrial Users. Of the 15 SIU's, 11 fall under a Federal Categorical Standard, including pharmaceutical manufacturing and metal finishing. Other permitted industrial processes include a soy bean oil processing facility, industrial laundering, beverage manufacturing, and a local POTW. Local permitted users include hospitals, printers and publishers, portable toilets, local landfills, and groundwater remediation.

You may have seen Pretreatment staff out at your facility taking samples. An effective Pretreatment Program must include the ability to collect and analyze wastewater samples such that laboratory results are both high in quality and legally defensible. The City of Raleigh's Pretreatment sampling and analysis activities allow the program to:

- 1) Confirm or determine compliance status
- 2) Support permit development, reissuance, and revision
- 3) Comply with North Carolina Long Term Monitoring Plan requirements and support local limits development
- 4) Provide data for industrial surcharge billing



WELCOME to the *Industrial Pretreatment Newsletter*—a biannual newsletter designed to educate and inform interested parties on current happenings in the City of Raleigh Industrial Pretreatment Program.

Monthly Reporting

Your friendly reminder about monthly reporting requirements:

- Reports due on the 20th of the month
- Cover page (Monthly Facility Status Sheet)
- Summary page (Industrial Data Summary Form)
- Lab reports and Chains of Custody

Noncompliance Reporting

- 24-Hour Notification requirement for any noncompliance
- Resample within one week of becoming aware of a violation
- Investigate cause of noncompliance

Under Construction—Neuse River WWTP

- Phased Design and Construction of Expansion to 75 MGD
- Expand Influent Pumping Capability
- Replace Existing Primary Clarification
- Design Additional Secondary Clarification Capacity
- Improve Filtration
- Additional Fine Screening Capacity
- Additional UV Disinfection Capacity



Under Construction—Little Creek WWTP

- New Flow Equalization
- New Bar Screen and Influent Pump
- New Clarifier Covers
- New Admin Building



What to Expect During an Inspection

The City of Raleigh is required to inspect all permitted Significant Industrial Users at least once per calendar year pursuant to 40 CFR 403.8(f)(2)(v). Information gathered from inspections help to determine completeness of the Industrial User's (IU) records, develop a relationship between POTW and IU, evaluate slug/spill control plans, reveal any issues requiring action, identify potential noncompliance, suggest pollution prevention strategies, and collect any samples if needed.

Industrial Users can prepare for inspections by having records readily available. A few key records include the current permit and permit application, copy of the previous POTW inspection report, any applicable Slug/Spill Control Plans and Toxic Organic Management Plans, waste hauling records, and sampling data.

During inspections in the 2013 calendar year, the Pretreatment Program took special note to address spill containment and potential storage issues. Please evaluate your drum and tote storage at your facility. Do you have floor drains nearby? If a drum or tote was punctured or spilled, would it reach the sewer? Could a drum spill cause a violation of your permit limits or harm the treatment plant? Locating drums and totes in areas without floor drains, or on spill pallets, is a great way to reduce the risk of accidental spillage.



City of Raleigh Industry Day

Each year, the City of Raleigh hosts an Industry Day event for our network of industrial users and interested parties. Industry Day was held on October 24, 2013 at the Neuse River Wastewater Treatment Plant. The event included general Public Utilities Updates, lunch and networking, and a tour of our treatment plant.

Each year, one or more industries receive the Pretreatment Award. The Pretreatment Award recognizes a commitment to permit compliance and cooperation with the Industrial Pretreatment Program. This year's winner was GlaxoSmithKline, located in Zebulon. The GSK Zebulon site manufactures, packages, tests, and ships many solid dose products, aerosol inhalers, and metered dose powder inhalers such as Advair.

The City of Raleigh thanks all attendees and participants in our annual Industry Day. We welcome you to attend next year's event which will be scheduled for Fall 2014.



For information concerning the City of Raleigh Industrial Pretreatment Program, please feel free to contact us:
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